

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.) No. 4:20-CR-00642-RWS-NCC-1
)
 MARC HAROLD TAYLOR, II,)
)
 Defendant.)

COMES NOW, the United States of America, by and through its attorneys, Saylor A. Fleming, United States Attorney for the Eastern District of Missouri, and Shane K. Blank, Special Assistant United States Attorney for said District, and makes the following disclosures pursuant to Rule 12(b)(4) of the Federal Rules of Criminal Procedure:

¹ The listing of a potential witness(es) is not meant to be all-inclusive. As the date set for hearings approaches, the Government may add, substitute, or delete witness(es) for various reasons.

Moreover, to the extent that any evidence outlined herein constitutes evidence of “Crimes or Other Acts” as contemplated by Federal Rule of Evidence 404(b), notice is hereby given that the Government intends, in the event of trial, to seek the admission of such evidence as probative of “motive, opportunity, intent, preparation, plan, knowledge, identity, absence of mistake, or lack of accident.”

DATE	EVENT / ITEM	DEFENDANT(S)	WITNESS
10 SEP 2020	Search of 4702 Kossuth Ave., St. Louis, MO; Seizure of Firearm (Machinegun) and Destructive Device	Marc H. Taylor, II	ATF/SA Eric. Shelyv

The Government has not included in its listing of events the various physical surveillance that occurred, nor any photographs or videotapes taken during surveillance, over the course of the investigation. Additionally, the Government has not listed any records obtained by subpoena. It is the Government’s position these events are not subject to suppression.

As additional evidence is found, and as supplemental information comes to the Government's attention, the Government may choose not to use some evidence described or to use evidence additional to that listed in these reports. If the Government chooses to use additional evidence, a supplemental Rule 12(b)(4) notice will be filed.

Respectfully submitted,

SAYLER A. FLEMING
UNITED STATES ATTORNEY

/s/ Shane K. Blank
SHANE K. BLANK, #65787MO
Special Assistant United States Attorney
111 South 10th Street, 20th Floor
St. Louis, MO 63102
314-539-2200

CERTIFICATE OF SERVICE

I hereby certify that on Wednesday, April 14, 2021, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon counsel of record for the defendant.

/s/ Shane K. Blank
SHANE K. BLANK, #65787MO
Special Assistant United States Attorney